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Comments:

Dear Mr. Tu,

The Craig Tribal Association is a federally recognized tribe located on Prince of Wales Island. Our tribal members participate in subsistence activities on the Forest involving fishing and foraging. Our tribal members also participate in non-consumptive uses of the Forest such as hiking, boating and wildlife viewing in designated recreational areas and all other designated land use zones.

The Craig tribe believes the Roadless Rule has worked on the Tongass and in Alaska. The planning processes that resulted in the Tongass Land Management Plan(s) and numerous individual projects including the Big Thorne Project and the Prince of Wales Landscape Level assessment were completed assuming that the Rule was in effect. Logging was allowed, and the industry as a whole has thrived at its post-pulp mill level. Logging proponents used the Rule to advocate for concentrated logging in waded areas, and this reasoning was adopted into the plans and project to the detriment of subsistence opportunities for community members and wildlife habitat.

The current Roadless Rule limits only road construction and logging in roadless areas of the Tongass. The assertion that the Rule substantially impacts the social and economic fabric of Southeast Alaska is unproven and there does not appear to be evidence to support the foundation of the argument for a change.

The conservation strategy incorporated into the Forest plans relies on habitat conservation areas, old growth, and wildlife mitigation corridors that extend across altitudes and through different types of forest. These corridors allow animals to move north and south, east and west, from high elevation to low, from summer feeding grounds to winter shelter from the weather. The high quality HCAs and corridors that have not been logged or roaded to date are predominately in the existing Roadless areas.

On behalf of the Craig Tribal Association tribal members, the tribe supports the status-quo and views the re-defining land use designations or re-designating current roadless areas to a different existing less restrictive management designation will unravel decades of work into the Tongass Land Management Plan and associated documents.

Thank you for the opportunity of the tribe to weigh in on this process.

Sincerely,

Clinton E. Cook, Sr.

Tribal President

Attachment: CTA Resolution 2018-37

TITLE: CRAIG TRIBAL ASSOCIATION TRIBAL COUNCIL TO AUTHORIZE TRIBAL SUPPORT FOR APPLICATION OF NATIONAL ROADLESS RULE ON THE TONGASS

NATIONAL FOREST and TO AUTHORIZE STRONG SUPPORT FOR LASTING PROTECTION OF THE ROADLESS RULE.

WHEREAS, the Craig Tribal Association-CTA, (IRA) is a duly constituted Indian Tribe, organized pursuant to the authority of Section 16 of the Act of Congress of June 18, 1934, (48 Stat.984), as amended by the acts of Congress, June 15th, 1935, (49 Stat.378 and May 1,

1936, (49 Stat. 1250), and

WHEREAS, the Craig Tribal Association Tribal Council is the governing body of the Craig

Tribe in accordance with its Constitution and By-Laws; representing the Association in all its undertakings for the well being of the Tribe, exercising their powers and authority to make rules and regulations, and

WHEREAS, protection of the inherent right to harvest and use traditional and customary

foods require careful stewardship and protection of the environmental and natural resources; and

WHEREAS, the care of the lands now classified as "inventoried roadless areas" in the Tongass National Forest stretches for millennia; and

WHEREAS, these lands not only provide Alaska Native people with food, they essentially define who are and where we come from; and

WHEREAS, inventoried roadless areas contain many sacred sites used for spiritual and religious practices and other customary uses and activities; and

WHEREAS, inventoried roadless areas conserve natural diversity, serve as a bulwark against the spread of invasive species, protect healthy watersheds ensuring clean drinking

water supply, and help ensure the continued protection of indigenous fish and wildlife habitat the social, nutritional, and ecological values; and

WHEREAS, the Tongass National Forest represents one of the highest carbon stores in the world and the conservation of intact inventoried roadless areas on the Tongass is essential for maintaining America's resilience slowing down climate change throughout the world; and

WHEREAS, the Roadless Rule prevents the disturbance of soils and wasteful construction of damaging roads in inventoried roadless areas; and

WHEREAS, according to the State of Alaska's own economic experts, Tongass timber is uncompetitive because of permanent and fundamental changes in global timber markets, high labor costs, distance from markets, and less expensive substitutes; and

WHEREAS, the Tongass timber industry represents less than one percent of today's jobs and earnings in Southeast Alaska; and

WHEREAS, there are over 5,000 miles of roads already crisscrossing the Tongass National Forest, fragmenting valuable wildlife habitat, threatening salmon by blocking fish passage, and serving as the primary source of sediment into fish streams; and

WHEREAS, spending millions of taxpayer dollars to build roads in inventoried Tongass roadless areas makes no economic sense, particularly given the agency's enormous road maintenance backlog; and

WHEREAS, at hearings held across Southeast Alaska in 2000 on the proposed Roadless Rule, nearly 60 percent of the Southeast Alaskans supported including the Tongass National Forest in the final roadless rule; and

WHEREAS, after the hearing held in Ketchikan during the summer of 2002, the draft supplemental environmental impact prepared to evaluate recommendations for designating additional inventoried roadless areas on the Tongass as "Wilderness", the Ketchikan Daily News reported that roughly 85 percent of the public who testified supported more "Wilderness";

WHEREAS, the State of Alaska petitioned the United States Department of Agriculture (USDA) to exempt Tongass inventoried roadless areas from the Roadless Rule on January 19, 2018;

WHEREAS, for all the above reasons, the State's petition severely mischaracterizes the actual extent and impacts of the Roadless Rule on Southeast Alaska; and

WHEREAS, the State's petition ignores the fact that the USDA narrowly tailored the Roadless Rule to limit only two activities in roadless areas, road construction and commercial logging; and

WHEREAS, the State of Alaska's petition ignores the Rule's established exceptions, including Federal Aid Highway projects connecting communities, access to mining claims, and logging incidental to otherwise permitted activities, including utility corridors and hydropower projects; and

WHEREAS, on August 2, 2018 the Forest Service signed a Memorandum of Understanding (MOU) with the State of Alaska to develop an Alaska-specific Roadless Rule that addresses management of inventoried roadless areas on the Tongass National Forest; and

WHEREAS, three days before the MOU was signed and six months after the State filed its petition, the Forest Service informed CTA by a letter dated 30 July 2018 that the U.S. Secretary of Agriculture Perdue and State of Alaska Governor Walker had reached an agreement to prepare an Alaska-specific rule that would replace the Roadless Rule and "provide for activities needed to further the State of Alaska's economic development while conserving roadless areas for future generations;" and

WHEREAS, the July 30th letter served as an invitation from Acting Regional Forester, David E. Schmid to a "Tribal Leader" inviting "government-to-government consultation in advance of a formal public comment period and an opportunity for you Tribe to participate as a cooperative agency," because of our "expertise on subsistence and potential impacts to specific communities within Alaska" during preparation of an environmental impact statement (EIS) to evaluate the proposed Alaska-specific Roadless Rule for the Tongass National Forest; and

WHEREAS, the U.S. Department of Agriculture, which includes the Forest Service, published a Notice of Intent (NOI) published on August 30, 2018 announcing an intent to prepare an environmental impact statement (EIS) and initiate a public rulemaking process; and

WHEREAS, the joint announcement issued by the Forest Service when the MOU was signed promises to leave unaffected Tongass lands designated "Wilderness" by Congress, but no mention is made of the fate of nearly 900,000 acres of Legislated LUD II lands designated for perpetual protection from logging and roadbuilding by Congress in the 1990 Tongass Timber Reform Act and the 2014 Sealaska Lands Bill; and

WHEREAS, any rule that weakens or eliminates Roadless Rule protections in what became Inventoried Roadless Areas of the Tongass National Forest will substantially affect the existing 2016 Tongass Land Management Plan Amendment; and

WHEREAS, the 2016 Plan Amendment excluded all roadless areas from the available timber base, the agency's failure to consult and coordinate forest planning with CTA will impair the Tribe's ability to fulfill its responsibility to "protect the general welfare and security" of tribal citizens; and

WHEREAS, the USDA and Forest Service entered into a MOU with the State of Alaska and issued the NOI for preparation of an EIS for an Alaska-specific Roadless Rule without prior consultation or collaboration with CTA; and

WHEREAS, one of the handouts provided by the Forest Service at the Ketchikan public scoping meeting on Monday, 17 of September 2018 identifies the responsibilities of the Tribe as a "cooperating agency" the Forest Service has not explained adequately why it failed to fulfill its' responsibilities to consult with the Tribe; and

WHEREAS, the State of Alaska resists all efforts to develop and work in a government to government relationship with Tribes and did not consult with the CTA before filing its' petition with the USDA; and

WHEREAS, Governor Walker issued Administrative Order 299, establishing the Alaska Roadless Rule Citizen Advisory Committee (CAC) on September 5, 2018; and

WHEREAS, Alaska Governor Walker appointed 13 Alaskans to the CAC, including the Alaska State Forester, to advise the State of Alaska on the future management of inventoried roadless area in the Tongass National Forest; and

WHEREAS, the Governor appointed a single Alaska Native to represent all tribal perspectives for the seventeen federally-recognized Tribes of Alaska in Southeast Alaska on the CAC, a gigantic and unrealistic burden for one person; and

WHEREAS, the only other Alaska Native on the CAC represents Sealaska Corporation and Sealaska is an Alaska Native for-profit Corporation established under the Alaska Native Claims Settlement Act is not a Tribe.

THEREFORE, BE IT RESOLVED, the Forest Service must initiate consultation, coordination and accommodation of tribal interest in any changes to TLMP connected with this rulemaking process; and

THEREFORE, BE IT FURTHER RESOLVED, given the serious and long-lasting Tribal implications from any reduction in current Roadless Rule protections, the Craig Tribal Association strongly objects to the Forest Service's failure to consult with CTA before deciding to grant the State of Alaska's petition and begin a review under the National Environmental Policy Act and public rulemaking process; and

THEREFORE, BE IT FURTHER RESOLVED, the only changes to the Roadless Rule that CTA can support is an update to the inventory used to define inventoried roadless areas subject to the Rule on the Tongass to include approximately 350,000 acres excluded from the 1995 inventory used for developing the 2001 Roadless Rule, because the agency assumed approved logging development would occur - when it did not; and

NOW, THEREFORE BE IT NOW RESOLVED, the Craig Tribal Association strongly supports lasting protection for all inventoried roadless areas within the Tongass National Forest as provided in the Roadless Rule.

Contents of letter duplicated in attachment